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January 18, 2019

**By ECF**

The Honorable Ann M. Donnelly  
United States District Judge  
United States District Court for the Eastern District of New York  
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Brooklyn, NY 11201

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Re: *United States v. Dan Zhong*  
Criminal Docket No. 16-614 (AMD)

Dear Judge Donnelly:

We write pursuant to Your Honor's January 15 Order to provide the Court with a further update concerning the parties' efforts to stipulate to the testimony of witnesses who are the subject of Mr. Zhong's pending motion for Rule 15 depositions.

The parties have reached an agreement in principle with respect to the testimony of one of the witnesses and are engaged in a good faith process with respect to the remaining witnesses that we believe is fruitful and should be given additional time to complete.

We propose to provide the Court a further update by the end of the day on Wednesday, January 23.

Respectfully submitted,

/s/ Robert J. Cleary  
Robert J. Cleary

cc: AUSA Alexander A. Solomon (by ECF)  
AUSA Ian C. Richardson (by ECF)  
AUSA Craig R. Heeren (by ECF)